

HACH ROSE SCHIRIPA & CHEVERIE LLP

ATTORNEYS AT LAW

December 12, 2019

VIA ECF and FACSIMILE (856-757-5355)

Magistrate Judge Joel Schneider
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: *Richard McBride, et al. v. Kline Construction Co., Inc., et al.*
Docket No.: 1:19-cv-14275-NLH-JS

Dear Judge Schneider:

As you are aware, we represent the Plaintiffs in the above-referenced matter. We write to respectfully request a one week extension of the deadline for filing of Plaintiff's Reply Brief regarding the stay issue from December 13, 2019 to December 20, 2019.

Pursuant to the Court's November 4, 2019 Amended Scheduling Order, Plaintiffs filed their letter brief in support of the stay issue on November 15, 2019. (Dkt. No. 23). On November 18, 2019, Your Honor entered a Text Order permitting Plaintiffs to file a Reply Brief on December 13, 2019. On December 6, 2019, counsel for Defendants faxed a letter to Your Honor requesting an adjournment of the deadline for Defendants' response letter from December 6, 2019 to December 9, 2019. Defendants filed their response letter supporting certifications on December 9 and 10, 2019. (Dkt. Nos. 26-27).

Given that the amount of time that Plaintiffs' counsel has to review and respond to Defendants' lengthy submissions has been shortened, Plaintiffs respectfully request that the Reply Brief deadline be extended to December 20, 2019. Counsel for Defendants, Carol Ann Slocum, Esq., has consented to this request.

We thank the Court for its consideration in this matter.

Respectfully submitted,



John A. Blyth

cc: All counsel of record (via ECF)